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**SOAH CONSOLIDATED DOCKET NO. 473-18-1265
PUC CONSOLIDATED DOCKET NO. 48785**

JOINT APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC, AEP TEXAS INC., AND LCRA TRANSMISSION SERVICES CORPORATION TO AMEND THEIR CERTIFICATES OF CONVENIENCE AND NECESSITY FOR 345-KV TRANSMISSION LINES IN PECOS, REEVES, AND WARD COUNTIES, TEXAS (SANDLAKE TO SOLSTICE AND BAKERSFIELD TO SOLSTICE)	§ § § § § § § § § §	PUBLIC UTILITY COMMISSION OF TEXAS
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PUBLIC UTILITY COMMISSION
FILING CLERK**

MOTION TO INTERVENE OF BARBOUR, INC.

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES Cathy Bellows, Authorized Representative of Barbour, Inc ("Intervenor") pursuant to P.U.C. Proc. R. 22.101, 22.103, and 22.104, and files this Motion to Intervene in the above-captioned docket. In support thereof respectfully shows the following:

1. On November 7, 2018, Oncor Electric Delivery Company LLC (Oncor) and AEP Texas Inc. (AEP Texas) (Oncor and AEP Texas are collectively the "Applicants") filed their joint application in this docket for an amendment to their certificates of convenience and necessity (CCN) to construct the proposed Sand Lake to Solstice double-circuit 345-kV transmission line project in Pecos, Reeves, and Ward Counties (Sand Lake to Solstice Project). Also on November 7, 2018, AEP Texas and LCRA TSC filed a joint application for an amendment to their CCN's for the proposed Bakersfield to Solstice 345-kV transmission line project in Pecos County (Bakersfield to Solstice Project) (collectively the "Projects"). Finally, on November 7, 2018, AEP Texas, Oncor, and LCRA TSC filed a joint motion to consolidate their respective dockets because the Projects share a common point of interconnection at the existing AEP Texas Solstice Switch Station. The above applications included lists of landowners that could be directly affected by one or more of the proposed segments. These lists included Intervenor as the owner of property located in Pecos County, Texas.

2. Intervenor has standing to intervene in this proceeding, as that term is defined in P.U.C. Proc. R. 22.103(b)(2), because Intervenor has a justiciable interest that may be adversely affected by the outcome of this proceeding. As stated above, certain property in Pecos and/or Reeves County is owned by Intervenor. Intervenor has received notice from Oncor that Intervenor's said property may be directly affected, as that term is defined in P.U.C. PROC. R. 22.52(a)(3), by the proposed transmission line that is the subject of this proceeding. This Motion to Intervene is filed before December 27, 2018 and therefore is timely filed.

3. Attorney Todd W. Boykin, pursuant to P.U.C. PROC. R. 22.101(a), hereby notices his appearance as counsel on behalf of Intervenor. Intervenor desires to be a party to the above-styled and docketed proceeding and have input in the routing process.

4. For these reasons, good cause exists to grant Intervenor's request to intervene pursuant to P.U.C. Proc. R. 22.104.

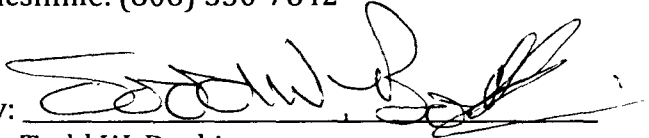
5. Intervenor requests that all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon its counsel as follows:

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WHEREFORE, PREMISES CONSIDERED, Intervenor respectfully requests that this Motion to Intervene be granted and that Intervenor be granted and allowed to participate in this proceeding as a party with all rights thereof to the full extent Intervenor desires to do so, and for such further relief to which Intervenor may be entitled.

Respectfully Submitted,

BURDETT, MORGAN, WILLIAMSON & BOYKIN, L.L.P.
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By: 

Todd W. Boykin
State Bar No. 02791600
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ATTORNEY FOR INTERVENORS

CERTIFICATE OF SERVICE

I certify that on the 20th day of December, 2018 a true and correct copy of the foregoing document was served in compliance with PROC. R. 22.74.



Todd W. Boykin